

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ETALON IMOB S.R.L. and MAOR ZINGER

Plaintiffs,

-against-

LAWRENCE H. SCHOENBACH, THE LAW OFFICES
OF LAWRENCE H. SCHOENBACH, PLLC,
INAH HOLDINGS, LLC, INTERNATIONALS ASSETS
& HOLDINGS, LLC, and RICARDO LEON

Defendants.

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Index No. 12 CV 6868 (BSJ)

**NOTICE OF
CROSS-MOTION
FOR CONTEMPT**

PLEASE TAKE NOTICE that upon the annexed Declaration of Raymond L. Vandenberg, the exhibits thereto, and the accompanying Memorandum of Law In Opposition to Defendants' Motion To Dismiss And For Protective Order And In Support of Plaintiffs' Cross-Motion for Contempt and all prior pleadings and proceedings had herein, Plaintiffs Etalon IMOB S.R.L. and Maor Zinger will move this Court, before the Honorable Judge Barbara S. Jones, United States District Judge, in her courtroom located at 500 Pearl Street, New York, New York, 10007, at a date and time to be determined, for contempt pursuant to this Court's inherent power and Local Civil Rule 83.6, and such other relief as may be just and proper.

PLEASE TAKE FURTHER NOTICE that Defendants' opposition papers, if any, are required to be served upon the undersigned counsel no later than fourteen days of service of

Plaintiffs' cross-motion, and Plaintiffs' reply papers, if any, are to be served upon Defendants' counsel no later than seven days after service of Defendants' opposition papers.

Dated: New York, New York

November 8, 2012

VANDENBERG & FELIU, LLP

By: /s/ Vincent J. Roldan
Raymond L. Vandenberg (RV 3661)
Vincent J. Roldan (VR 7450)
60 East 42nd Street, 51st Floor
New York, New York 10165
(212) 763-6800
Attorneys for Plaintiffs